

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

EXPERIMENTAL "RIDE-ALONG"
CLASSIFICATION CHANGE FOR PERIODICALS, 1999

Docket No. MC2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SCHWARTZ TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T2-7-8)

The United States Postal Service hereby provides the responses of witness Schwartz to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T2-7-8, filed on November 2, 1999.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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November 12, 1999

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHWARTZ
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T2-7. Please refer to the testimony at page 4, lines 9-14.

- a. How many members of the Magazine Publishers of America (MPA) provide their Mailing Statements, Form 3541, to the Postal Service in hardcopy (paper)? How many members of the Magazine Publishers of America (MPA) provide their Mailing Statements, Form 3541, to the Postal Service in an electronic format?
- b. How many members of the Postal Committee provide their Mailing Statements, Form 3541, to the Postal Service in hardcopy (paper)? How many members of the Postal Committee provide their Mailing Statements, Form 3541, to the Postal Service in an electronic format?

RESPONSE:

- a. Based on my industry experience, I would assume that all members of the Magazine Publishers of America, Inc. ("MPA") who are on CPP would submit their Mailing Statements, Form 3541, to the Postal Service in an electronic format, but I do not know this to be a fact. As for MPA members who are not on CPP, I do not know whether they submit their Mailing Statements, Form 3541, to the Postal Service in an electronic or paper form. Finally, I do not know how many MPA members are in either category (on CPP, and not on CPP).
- b. In the survey of members of MPA's Postal Committee, we asked whether they were on CPP. We did not ask how they submitted their Mailing Statements, Form 3541, to the Postal Service, and, as a result, while I would assume that all those members who responded to the survey and identified themselves as being on CPP (10 of the 15 who responded) submit their Mailing Statements, Form 3541, to the Postal Service electronically, I do not know this for a fact.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHWARTZ
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OCA/USPS-T2-8. Please refer to the testimony at page 3, lines 17-18.

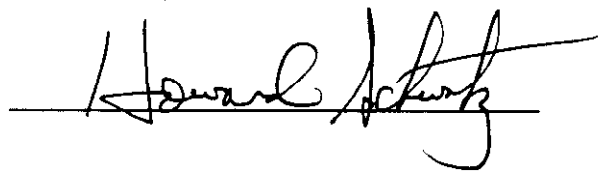
- a. If the "Ride-Along" rate of \$0.10 per piece is approved, please estimate how many or what percent of the "3.339 million Standard A advertising units" would be mailed at the "Ride-Along" rate
- b. Is it your expectation that Periodicals mailers on the Postal Committee, other than Conde Nast Publications, who currently include Standard A enclosures or attachments with their Periodicals pieces will mail those enclosures or attachments at the "Ride-Along" rate (if approved) in the same proportion as Conde Nast Publications? Please explain.
- c. Do any of the "3.339 million Standard A advertising units" travel together? That is, does Conde Nast ever mail more than one "Standard A advertising unit" with a single copy?

RESPONSE:

- a. I would estimate that all of the "3.339 million Standard A advertising units" described in my testimony at page 3, lines 17-18 would be mailed at the "Ride-Along" rate.
- b. I have no way of knowing whether members on the Postal Committee, other than Conde Nast, would mail Standard A enclosures or attachments with their Periodicals "in the same proportion as Conde Nast Publications," but my expectation is that most of the mailers would.
- c. No Conde Nast periodical has ever carried two separate Standard A advertising units in a single edition. In fact, throughout all of 1998, and out of all editions of the 17 separate periodicals published by Conde Nast, only 10 editions carried any Standard A advertising insert at all.

DECLARATION

I, Howard Schwartz, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Howard Schwartz", is written over a horizontal line.

Dated: 11-12-99

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott Reiter", is written over a horizontal line.

Scott L. Reiter

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